

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

In re:

Case No: 14-32433

Marliene Smith

Judge Whipple

Debtor

MOTION TO REOPEN CLOSED  
BANKRUPTCY CASE FOR LIMITED  
PURPOSE OF FILING REAFFIRMATION  
AGREEMENTS

Lafe Tolliver (0023725)  
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Now comes the above captioned Debtor and petitions this Court for an Order allowing the Debtor to reopen her closed Chapter 7 bankruptcy Case for the limited purpose of filing two reaffirmation agreements that pertain to her home mortgage and her automobile.

The Debtor contends that prior counsel who filed her initial bankruptcy papers did not inform the Debtor of the need to seek out and submit to The court reaffirmation papers on the secured debts of a home mortgage Payable to PNC Bank and on an automobile note payable to Chrysler

Financial.

The Debtor contends that it is in her best financial interest to have such agreements filed with the bankruptcy court and upon a court order being issued and the same being sent to the two secured creditors, they will in turn send out the needed paperwork for the Debtor's signature.

WHEREFORE, for good cause shown herein and for the benefit of the Debtor to maximize the benefit of the bankruptcy laws, the Debtor would petition this Court for an Order allowing her case to be reopened for the foretasted limited purposes.

Respectfully submitted,

/s/Lafe Tolliver, Attorney

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#### CERTIFICATE OF SERVICE

The following parties were served with e mail notices via the court's electronic mail notice system:

Douglas A. Dymarkowski [doug.dadlaw@bex.net](mailto:doug.dadlaw@bex.net),  
[ddymarkowski@ecf.epiqsy6stems.com](mailto:ddymarkowski@ecf.epiqsy6stems.com)  
[Tony.dadlaw@bex.net](mailto:Tony.dadlaw@bex.net)  
Benjamin A. Randall [benjrandall@gmail.com](mailto:benjrandall@gmail.com)  
United States Trustee (Registered address)[@usdoj.gov](mailto:@usdoj.gov)

The following parties were noticed by regular USPS mail:

PNC Bank  
1 NCC Parkway  
Mail code Z1-YB43-02-1  
Kalamazoo, MI 49009-8003

Chrysler Financial  
2777 Inkster Road  
Farmington Hills, MI 48334-5326

Chrysler Financial  
Pob: 2993  
Milwaukee, WI 53201-2993

/s/Lafe Tolliver, Attorney

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